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Sent: Monday, September 08, 2008 11:33 PM

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Subject: Public comments on wac 246.doc/James Green

Please see attachment for my comments on WAC 246.doc and include in all board member packets for the meeting on Wednesday. Thank you, James Green

Public comments on WAC 246-346 rule by JAMES W. GREEN

I have been involved in the process of this rule revision from conception and while I believe that it is very lacking in some vital areas, it does provide and represent a palatable compromise by all parties affected and represented during the process. The one exception, or perhaps oversight, is the statutory authority reference, such as RCW 43.20.050 that was in the old law. This needs to be added back in.

After re-reading the info, comments, testimonials, and such, it seems that a reminder that these are merely minimum standards to protect children in schools that they are required by law to be in! There has intentionally been room left for local control to do more and also accommodations for variances. Again, the key word is minimum standard!! While sympathetic to the funding plights, consider that much of the law is the same as it has been for 30yrs. With exception of clarity, which has been added, one should be able to assume cost neutral on those items as they were in the law for 30 some yrs., a minimum standard, and surely followed!!!! "To protect the children of the state of Washington."

To the legislators comments, I would say that first come the recommendation of the minimum standard law [after all the public comments, panels, meetings, forums, and, other] then as legislators do, they will fund it somehow, as they are quite crafty at coming up with a way for something so critical as protecting the children of WA. With a mere minimum standard, also of note here is the fact that implementation has already been phased in to accommodate the new expense of the law over a period, so the remainder of the law that has only been clarified for interpretation should go into effect immediately, as it is already law. The rest I am sure will be fully funded! Again, as it is for the children and the children come first!!! I am aware there are several other programs, plans, proposals, etc. by several other organizations which are in some phase of realism but none, I believe, is as thorough and inclusive of stakeholders as the SBOH proposal, and it is their statutory duty to make the recommendation, therefore, the law should come first, then the other entities and their programs should conform to the law. This should also hold true for funding. Fund the minimum standard first, then other programs.

Again this draft represents a great compromise by all and I strongly support your SBOH approval with minor changes mentioned above and full funding by legislature which is the next step of the very long process.